

**From:** [Couch, V. Stuart \(EOIR\)](#)  
**To:** [Holmes-Simmons, Theresa H. \(EOIR\)](#); [Harris, Rodger \(EOIR\)](#); [Riggs, George W. \(EOIR\)](#)  
**Cc:** [Owen, Sirce E. \(EOIR\)](#); [Madico, Beatriz A. \(EOIR\)](#); [Feeley, Catherine \(EOIR\)](#)  
**Subject:** 4th Cir "Unable or Unwilling" case: Orellana v. Barr  
**Date:** Tuesday, May 28, 2019 11:57:05 AM  
**Attachments:** [Cordova v Holder - gang PSG.pdf](#)

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All,

Here's a new 4th Circuit published decision from last week in a pre-*Matter of A-B*- domestic violence case that everyone must read: <http://www.ca4.uscourts.gov/opinions/181513.P.pdf>. Note that the DHS stipulated to credibility, PSG and nexus (what's left?) and chose to fight on the "unable and unwilling" prong. The Court acknowledges the DHS intends to withdraw from these stipulations on remand – (b) (5)

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